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11 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

12
13 VPN.COM LLC,
Plaintiff,

14 vs.

15 GEORGE DIKIAN et al.

16 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

STIPULATION AND ORDER TO
MODIFY SCHEDULING ORDER

1 **WHEREAS**, Trial in this action is currently scheduled for November 7,
2 2023, at 8:30 a.m., and a Final Pretrial Conference scheduled for October 20,
3 2023, at 11:00am (*see* Doc. No. 39) (“Scheduling Order”);

4 **WHEREAS**, the Court previously granted the Parties’ stipulations to
5 extend certain pretrial dates (but did not continue the Trial or Final Pretrial
6 Conference) (Doc. No.’s 45, 58);

7 **WHEREAS**, currently pending before the Court is Plaintiff’s Motion to
8 Modify the Scheduling Order (including to continue the Trial and Final Pretrial
9 Conference) (Doc. No. 78); and

10 **WHEREAS**, the Parties agree there is good cause for a first continuation
11 of the Trial and Final Pretrial Conference and a further extension of certain
12 pretrial deadlines, due to: the current case posture; the need to complete further
13 discovery; and inconsistent pretrial filing dates currently in the original
14 Scheduling Order;

15 **IT IS THUS STIPULATED AND AGREED**, by and between the
16 parties, through undersigned counsel, that:

- 17 1. Upon the Court granting this stipulation, Plaintiff’s currently pending
18 Motion to Modify the Scheduling Order (Doc. No. 78) shall be
19 deemed withdrawn;
20
21

2. The current Trial and Final Pretrial Conference are hereby continued and shall be taken off the Court's calendar; and
3. The Scheduling Order be modified as indicated in the below table, and any pretrial date not indicated below be governed by the prior Scheduling Order and subsequent modifications in Doc. No.'s 45, 58:

Event	Court Order
Trial	04/23/24 at 8:30 AM
Final Pretrial Conference	04/12/24 at 11:00 AM
Trial Filings (Second Round)	03/29/24
Trial Filings (First Round)	03/22/24
Last Date to Hear Motion to Amend Pleadings/Add Parties	03/01/24
Last Date to Hear Motions (including Summary Judgment)	03/01/24
Non-Expert Discovery Cut-Off	02/02/24

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Dated: October 12, 2023 By: /s/ Michael Cilento
Michael D. Cilento (*proc hac vice*)
Attorneys for Plaintiff VPN.Com

Dated: October 12, 2023 By: /s/ Mike Rodenbaugh
Michael L. Rodenbaugh (SBN 179059)
Attorneys for Defendant Dikian